



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

OCT 27 2008

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BUREAU OF AIR QUALITY

Ms. Myra C. Reece, Chief
Bureau of Air Quality
South Carolina Department of Health and
Environmental Control
2600 Bull Street, Columbia, SC 29201

Dear Ms. Reece:

We are in receipt of your annual ambient air monitoring network plan, as required by 40 Code of Federal Regulations (CFR) Part 58.10, dated August 13, 2008. The submitted plan covers the ambient air monitoring network for the State of South Carolina. We understand that your agency provided a thirty (30) day comment period and appreciate your attaching those to this final plan. According to 40 CFR Part 58.10(a)(2), since you have already allowed for public inspection and comment, the Regional Office is not required to offer another comment period. This plan is conditionally approved pending the following deficiencies are addressed.

New ambient air monitoring rules in 40 CFR Part 58 were finalized in December 2006. Accordingly, new regulatory requirements were put in place addressing network plans, data certification, and minimum monitoring requirements, among others. There are several recommended changes for your agency to consider when developing the annual plan for next year. Minimum monitoring requirements are based on Metropolitan Statistical Areas (MSAs). We appreciate the summary of your network outlined by MSA listed on page 7.

The United States Census Bureau currently shows eight MSAs for the state of South Carolina: (from smallest to largest) Sumter, Florence, Myrtle Beach, **Augusta-Richmond County, GA-SC**, Charleston, Columbia, Greenville-Spartanburg-Anderson CSA, and **Charlotte-Gastonia-Rock Hill, NC-SC**. Those in **bold** cross state boundaries. New minimum monitoring requirements for all criteria pollutants are listed at 40 CFR Part 58 Appendix D. There are no minimum monitoring requirements for Carbon Monoxide (CO), Lead (Pb), Nitrogen Dioxide (NO₂) and Sulfur Dioxide (SO₂) unless required by the establishment of a National Core (NCORE) multipollutant monitoring station and/or your State Implementation Plan (SIP). However, new minimum monitoring requirements for Ozone (O₃), Particulate Matter less than 2.5 microns (PM_{2.5}) and Particulate Matter less than 10 microns (PM₁₀) were promulgated. By our review of your ambient air monitoring network in accordance with these new criteria listed in 40 CFR Part 58, we offer the following additional comments and recommendations.

Ultimately, it is the responsibility of the State agencies to discuss the maintenance of minimum monitoring requirements with areas in your state that cross state boundaries, especially in the event of terminating the operation of a monitor or whole site closure. 40 CFR Part 58 Appendix D(2)(e) states, "The EPA recognizes that State or local agencies must consider MSA CSA boundaries and their own political boundaries and geographical characteristics in designing their air monitoring networks. The EPA recognizes that there may be situations where the EPA Regional Administrator and the affected State or local agencies may need to augment or to

divide the overall MSA/CSA monitoring responsibilities and requirements among these various agencies to achieve an effective network design. Full monitoring requirements apply separately to each affected State or local agency in the absence of an agreement between the affected agencies and the EPA Regional Administrator." Agreements with each state were made last year that both parties agree to either share or individually maintain the minimum monitoring requirements overall per your letter to the State of Georgia dated October 9, 2007, and letter to the State of North Carolina dated January 12, 2007. We consider these agreements valid until canceled or breached by either party for these particular areas.

We have noticed quite a few changes to your network that were not outlined as changes in last year's network plan. Some of these changes can not be approved by this office. Specifically, a number of SLAMS monitors were redesignated as SPM in the 2007-2008 monitoring plan. There was no notification in last year's plan that these changes were being made. Monitor Types were simply written in as SPM with no further indication or explanation. We specifically asked each agency to outline any changes up front as you did in this year's plan. Any change to an existing SLAMS monitor must always follow normal written notification requesting concurrence by this office. While we will take into consideration the changes outlined in your current plan, we cannot guarantee that we will issue approval for any of these actions. Also, appropriate documentation for the start up and shut down of any SLAMS monitor or violating SPM monitor, should be accompanied by formal written communication outside of the network plan.

Minimum Ozone Monitoring Requirements **40 CFR Part 58 Appendix D Table D-2**

Unless listed in this section, we consider the current network as described in your 2008 Ambient Air Monitoring Network Plan, to meet or exceed the minimum requirements listed in 40 CFR Part 58.

The Augusta-Richmond County, GA-SC and Charlotte-Gastonia-Rock Hill, NC-SC MSAs are each required to minimally operate and maintain two ozone monitors. Agreements with the states of Georgia and North Carolina currently satisfy minimum requirements.

Minimum PM10 Monitoring Requirements **40 CFR Part 58 Appendix A 3.3.1** **40 CFR Part 58 Appendix D Table D-4**

40 CFR Part 58 Appendix A 3.3.1 lists the requirements for collocated sampling procedures for manual PM10 methods. Fifteen percent of the agency's manual PM10 network (at least one site) should be collocated and these sites should be among those measuring the highest 25 percent of the annual mean concentrations. This pertains to each sampling method. The state of South Carolina's current PM10 primary monitoring and collocation network meets or exceeds the minimum requirements.

Minimum PM2.5 Monitoring Requirements (including collocation) **40 CFR Part 58 Appendix A 3.2.5** **40 CFR Part 58 Appendix D Table D-5**

40 CFR Part 58 Appendix A 3.2.5 lists the requirements for collocated sampling procedures for each FRM or FEM PM2.5 method. Fifteen percent of the agency's PM2.5 network (for each method and at least one site) should be collocated and these sites must be collocated with a monitor having the same EPA FRM method designation. In addition, for those sites using FEM methods, 50 percent designated for collocation must be collocated with an audit monitor having the same method designation and 50 percent with an FRM audit monitor. The state of South Carolina's current PM2.5 primary monitoring and collocation network meets or exceeds the minimum requirements.

PM2.5 Continuous Monitoring Requirements

40 CFR Part 58 Appendix D 4.7.2

Regulatory requirements for continuous PM2.5 monitoring requires that "...State, or where appropriate, local agencies must operate continuous PM2.5 analyzers equal to at least one-half (round up) the minimum required sites listed in Table D-5 of this appendix. At least one required continuous analyzer in each MSA must be collocated with one of the required FRM/FEM/ARM monitors, unless at least one of the required FRM/FEM/ARM monitors is itself a continuous FEM or ARM monitor in which case no collocation requirement applies." This requirement is currently met in the state.

PM2.5 Background and Transport Sites

40 CFR Part 58 App. D 4.7.3

Background and Transport sites are identified in the 2008 Network Plan. This requirement is satisfied. If this is listed incorrectly, please notify us as soon as possible.

Background site: Oconee County, 45-073-0001

Transport site: Chesterfield County, 45-025-0001

Air Quality Index (AQI) Reporting

40 CFR Part 58.50

AQI reporting is only required in MSAs with a population of 350,000 as of the last official United States Census. There are three MSAs in the state of South Carolina required to report an AQI: Columbia, Greenville and Charleston. Your network plan adequately addressed these areas on page 3 and currently satisfies this requirement.

Monitoring Network Changes Requested by SC DHEC

Page 10 of your 2008 Network Plan lists several recommended and/or planned changes to your ambient air monitoring network. As was mentioned above, some site changes in last year's plan were not outlined up front as they were this year. Please note the status of the following changes by this office.

SITE ID	COUNTY	SITE NAME	PARAM	CHANGE	Approved?/Reason
001-0001	Abbeville	Due West	O3	SLAMS to SPM	NO, VIOLATING
003-0003	Aiken	Jackson Middle	O3	SLAMS to SPM	NO, VIOLATING
019-0048	Charleston	FAA Beacon	PM2.5	SLAMS to SPM	Yes
021-0002	Cherokee	Cowpens	O3	SLAMS to SPM	NO, Public Comments

037-0001	Edgefield	Trenton	PM2.5	SLAMS to SPM	Yes
043-0006	Georgetown	G-town CMS	PM10	SLAMS to SPM	NO, HIGHEST CONC'N
043-0010	Georgetown	Howard High	PM10	SLAMS to SPM	Yes
073-0001	Oconee	Longcreek	O3	SLAMS to SPM	NO *
077-0002	Pickens	Clemson CMS	O3	SLAMS to SPM	NO, VIOLATING
091-0006	York	York CMS	O3	SLAMS to SPM	NO, VIOLATING

 * Historical, true regional scale background ozone site

The sites above that are currently violating the NAAQS, cannot be terminated at this time. The monitor types for these sites must be changed back to SLAMS in AQS and they must operate for at least one additional calendar year to compare with new sites that SC DHEC is proposing to establish.

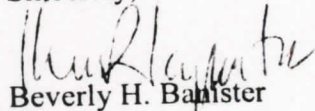
Also, as sampling frequencies change, please make sure that this change is also reflected in EPA's AQS database in order to maintain accurate data completeness calculations.

National Core Monitoring Network (NCore)

It is not apparent where SC DHEC has designated their NCore site. 40 CFR Part 58.10(a)(3) records that the Annual Network Plan due July 1, 2009, must include your plan for establishing this site and provide for this site to be operational by January 1, 2011.

Lastly, we appreciate the addition of the listing of your ambient air monitoring equipment and the condition of these monitors in Appendix B. All required changes must be in place by January 1, 2009. Please notify us of any problems in meeting any of these requirements identified above. If you have any questions or concerns, please contact Mr. Doug Neeley at (404) 562-9097 or Mr. Darren Palmer at (404) 562-9052.

Sincerely,



Beverly H. Banister

Director

Air, Pesticides & Toxics
 Management Division

cc: Antonio Quinones, SESD
 Mr. Robert W. King, Jr., P.E., SCDHEC
 Scott Reynolds, SCDHEC
 Lewis Weinstock, OAQPS